

### **REMARKS/ARGUMENTS**

Claims 1-20 remain pending, and Claims 1, 6, 12 and 17 have been amended in this response. Applicant respectfully requests reconsideration in light of the following remarks.

#### **Rejection of Claims 1-20 under 35 U.S.C. 103(a)**

Claims 1-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chowdhary (US Patent 6,675,278) in view of Ryan (US Patent 5,748,551), or further in view of Duncan (US Patent 5,832,213). Applicant respectfully traverses the rejection for the following reasons.

Ryan is directed to a memory device, in which the memory array is divided into multiple banks. Commands and addresses applied to the memory device affect all internal banks identically and in the same manner. Examiner asserts time and again that “Ryan teaches mapping to physical memory based on the (logical) block index.” In response, Applicant firmly believes that what Ryan discloses ONLY involves operating the memory devices in physical address space. Nothing throughout Ryan involves logical address space, and nothing throughout Ryan involves mapping from logical address to physical address. There has not any pertinent term, such as “logical (address)” or “mapping” been mentioned in the Ryan’s entire disclosure. The fact that Ryan’s disclosure is restricted to physical address operation cannot be negated even Ryan discloses operation on multiple banks,

and reducing pre-charge time on a time-staggered basis. Examiner alleges that mapping “inherently” exists in Ryan. Applicant respectfully notes that such conclusion is without technical basis, and beyond apprehensibility a person skilled in the pertinent art can properly master.

Cited reference Chowdhary did disclose “mapping” from a logical address space to a physical address space. Nevertheless, what is involved in Chowdhary is managing memory to make data pages contiguous so that free space/hole is small, such is not a mapping that “makes **each one** of the block indexes map **in turns** to one physical address located at different banks, and result in any logical adjacent block of data be stored physically at different banks of the memory” as originally claimed. Even though portions of the data, in Chowdhary, are at some times mapped and stored physically at unconnected banks of the memory as Examiner may say, the cited reference Chowdhary does not **at all times** (/always) map in turn and store the data physically at unconnected banks. For more explicitly and specifically distinguish the claimed invention from cited prior art, Applicant now amends Claim 1 to recite that the mapping step “makes each one of the block indexes at all times map in turns to one physical address located at different unconnected banks, and result in any logical adjacent block of data be stored physically at different unconnected banks of the memory.” Other independent Claims 6, 12 and 17 have been similarly amended. This amendment is supported by the originally filed specification and drawings, and thus no new

matter is added.

On these grounds Applicant has come to the conclusion that a person skilled in the pertinent art will not modify Chowdhary with Ryan. Even Ryan were used to modify Chowdhary, the combination still does not result in the claimed invention, for the reasons that Ryan's disclosure teaches nothing about mapping from a logical address space into a physical address space in the claimed manner.

With respect to dependent claims not specifically mentioned, it is submitted that these claims are patentable not only by virtue of their dependency on their respective base claims, but also for the totality of features recited therein. Cited prior art Duncan does not make up deficiency of Chowdhary or Ryan.

### **CONCLUSION**

In light of the above amendments and remarks, Applicant respectfully submits that Claims 1-20 as previously presented are in condition for allowance. Accordingly, reconsideration is respectfully requested.

Respectfully submitted

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